



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 20 2018

REPLY TO THE ATTENTION OF
WC-15J

CERTIFIED MAIL 7016 3560 0000 4829 8924
RETURN RECEIPT REQUESTED

Central Sands Dairy, LLC
Attention: (b) (6)
15918 County Road G
Nekoosa, Wisconsin 54457

Subject: June 21-22, 2017 Compliance Evaluation Inspection

Dear (b) (6):

Enclosed, please find a copy of the U.S. Environmental Protection Agency Inspection Report for the Concentrated Animal Feeding Operation inspection conducted at Central Sands Dairy, LLC on June 21-22, 2017. The purpose of the inspection was to evaluate and document compliance with the Clean Water Act and Central Sands Dairy, LLC's Wisconsin Pollutant Discharge Elimination System permit WI-006353302.

If you have any questions, please contact Cheryl Burdett of my staff at (312) 886-1463.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Bahr", is written over a horizontal line.

Ryan Bahr, Chief, Section 2
Water Enforcement and Compliance Assurance Branch

Enclosures

cc: Bruce Rheineck, WDNR
Aaron O'Rourke, WDNR
Andy Morton, WDNR
Laura Chern, WDNR
MaryAnne Lowndes, WDNR

**CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Purpose:

Compliance Evaluation Inspection

Facility:

Central Sands Dairy, LLC
15918 County Road G
Nekoosa, Wisconsin 54457
Juneau County
44.22N, -89.97W

NPDES Permit Number:

WI-0063533-02-0

Date of Inspection:

June 21-22, 2017

EPA Representatives:

Cheryl Burdett	312-886-1463
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Joan Rogers	312-886-2785
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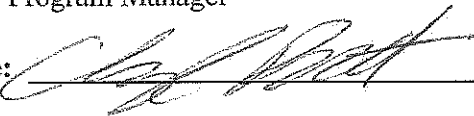
State Representatives:

Michelle Scarpace	608-275-3281
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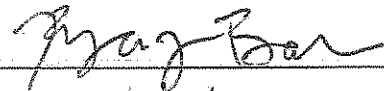
Facility Representatives:

(b) (6) – Dairy Manager	(b) (6)
(b) (6)	
(b) (6), Central Sands Dairy	(b) (6)
(b) (6)	
Cameron Field, Attorney	602-283-2259
cfield@michaelbest.com	

Report Prepared by:
Cheryl Burdett, CAFO Program Manager

Inspector's Signature: 

Approver Title: Ryan Bahr, Section 2 Chief, Water Enforcement and Compliance Assurance Branch

Approval Signature: 

Approval Date: 9/20/18

1. LIST OF ATTACHMENTS:

ATTACHMENT A: PHOTO LOG

ATTACHMENT B: SITE LAYOUT AND PROPOSED TOPOGRAPHY
FACILITY DEVELOPMENT PLAN

ATTACHMENT C: PERMIT COMPLIANCE SCHEDULE

ATTACHMENT D: ADDITIONAL AREAS OF CONCERN

Table 1:	2017 Application Rates
Table 1A:	2017 Additional Land Application Concerns
Table 2:	2016 Nitrogen Application Rates
Table 3:	2015 Nitrogen Application Rates
Table 4:	2013-2016 Four Year Average Uptake Rates of Phosphorus
Table 5:	2017 Insufficient Number of Soil Samples Taken based on Acreage

ATTACHMENT E: DOCUMENTS SCANNED, PHOTOGRAPHED,
PROVIDED TO EPA BY CENTRAL SANDS
DAIRY, LLC, OR WDNR'S E-PERMITTING WEBSITE

2. BACKGROUND

The purpose of this report is to describe, evaluate, and document Central Sands Dairy, LLC's (CSD) compliance with the Clean Water Act (CWA) and its WPDES Permit WI-0063533-02-0 at its Nekoosa, Wisconsin facility. The inspection and review were performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

CSD is a large concentrated animal feeding operation (CAFO) based on the number of animals confined at the facility for 45 days or more during a twelve-month period.

3. SITE INSPECTION

EPA introduced ourselves at around 9:00 AM, presenting our credentials. EPA then proceeded to go through the Region 5, CAFO Checklist. Tables 2 through 7 reflect information provided by CSD personnel before the walk-through of the facility, unless otherwise noted.

Table 1: Site Entry

Arrival Time:	9:00 AM
Temperature:	68° Fahrenheit
Precipitation:	None
Presented credentials?	Yes, at approximately 9:00 AM
Credentials presented to whom and at what time?	(b) (6) and (b) (6)
EPA vehicle parked in approved location?	Yes
Location where EPA vehicle was parked?	Next to the office
Disposable boots worn?	Yes
Other bio-security measures taken:	Yes. EPA had not been on any other Animal Feeding Operations that week. EPA did not enter barns where animals were present.

Table 2: Checklist

Checklist(s) Used	
R5 CAFO Inspection Checklist	
Federal CAFO Nutrient Management Plan Checklist	
Inspection Report as a Checklist	
Facility Documents Reviewed:	
Documents reviewed after the inspection are listed in Attachment E.	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No
Which information does the facility consider to be CBI?	None

Table 3: Facility Description

Type of Animal	Number of Animals	Capacity	Type of Confinement
Dairy	3510 milking – 4200 total milking and dry. No calves or heifers	4200-4400	All in Barns
Minimum Number of Animals in previous 5 years:			Always between 4200-4400
Maximum Number of Animals in previous 5 years:			Always between 4200-4400
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:			4200-4400
Amount of Liquid Manure Generated per year:			Total 60 million gallons
Amount of Solid Manure Generated per year:			20,000 tons – fiber portion after digester
Does the facility have an NPDES Permit?			Yes – Permit Term Effective January 1, 2012. WDNR did a permit modification issued on July 7, 2016. CSD appealed a portion of the modified permit WPDES permit WI-0063533-02-0. According to CSD, they are required to follow the modified permit, but not the portion of the modified permit that was appealed. The modified WPDES Permit WI-0063533-02 expired on 12/31/2016. The new permit

	had not been issued at the time of the inspection.
SIC or NAICS code:	0241
CAFO Defined Reason	Size
Do animals have direct access to WOUS?	No
Are crops, vegetation, forage growth, or post-harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?	No
What is the area (acres) of the production area?	80 acres
What is the area (acres) of the pasture?	None
How many employees (not counting family members)?	32
Other facilities under common ownership (name and address): None	

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Amount of Waste Removed	Days of Storage
Manure storage lagoon	22 million gallons	Concrete	On south bank of manure storage lagoon	< 1 month ago	CSD personnel asked that we look in the daily logs	180 days
Solid Stacking					10+ K tons	
Records at site of storage structure design?				Yes		
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.				<p>CSD stores solids from December through April on a stacking pad. According to CSD, the solids can be spread as necessary according to CSD's WPDES Permit.</p> <p>The process wastewater flows off the pad where the solids are stored to a pit that pumps to the digester. The pump is designed to collect the 1st 4 inches during a rain event. The remaining process wastewater flows into an engineered grass depression. The depression does not have an overflow; it infiltrates into the ground.</p>		
Are records kept of the level of manure in the storage structures?				Yes		

When was the last time a storage structure was emptied, either partially or completely?	< 1 month prior to June 21, 2017
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?	According to (b)(6) and (b)(6) (b)(6) it varies and is ongoing and they suggested that we check the records to find out how much was emptied from the structures.
Do the facility personnel inspect and keep records of all diversion devices?	No
Do the facility personnel inspect and keep records of all impoundments?	Yes
Do the facility personnel inspect and keep records of all the water lines?	Yes
Do the facility personnel perform routine visual inspections and keep records of the production area?	Yes, conduct daily visual checks.
Does the waste storage system have a managed outfall or discharge point? If yes, provide a description of the outfall and a description of the area receiving the discharge.	No
Has the facility had any documented discharges of livestock waste to surface water in the past year?	No
Are there safety devices installed around any manure storage ponds? (Barriers at the end of manure push off platforms, fences around pond, signage.)	No

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:
<p>Solid manure is stacked on a pad that drains into a manhole that is piped to the digester.</p> <p>Freestall Barns are highest in the middle and have a 0.75% grade down toward each side. The Freestall Barns are flushed with process wastewater from the manure storage lagoon and the process wastewater is collected in the flush pit, which is then pumped to the digester. The solids are put through the digester and the liquid is then pumped to the manure storage lagoon.</p> <p>All process wastewater and manure in the manure storage lagoon is injected. Central Sands used to irrigate its process wastewater, but due to nitrate levels; CSD stated that they have not irrigated in the last three years. However, the permit allows for irrigation of manure and process wastewater.</p>
Describe the way used bedding is collected and disposed of at the facility:

CSD uses the McLanahan system to separate manure and used bedding, so that the sand can be reused as bedding.	
Are mortality records kept?	Yes
Describe the way mortalities are managed at the facility:	
Mortality shed on the southwest corner of the production area. According to CSD, when they call the rendering company, the rendering company will come out either the same day or the next business day.	
What type of method is used to provide drinking water for the animals?	Float type drinkers – 5 per pen.
Describe the way spilled drinking water is collected and disposed of at the facility:	
The spilled drinking water is collected with manure and urine and flows via gravity to its manure storage lagoon.	
Describe the way mist cooling water is collected and disposed of at the facility:	
The mist cooling water is used in all the barns, except the dry cow barn. It is collected in the flush pit which is then pumped to the digester. The liquid is then pumped to the manure storage lagoon.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
CIP and teat dip are stored in a separate room in the milking parlor building. The chemicals in the room include: 55-gallon drums – 6 for CIP, 6 for teat dip. Drains in the chemical room drain to the flush pit then to the manure storage lagoon.	
Describe the way water has been used to wash/flush barns and where the process wastewater is collected and disposed of at the facility:	
The holding pen is flushed with process wastewater from the manure storage lagoon. The milking parlor uses clean water to rinse the parlor. The process wastewater from both areas go into the flush pit then to the digester. The liquid from the digester goes to the manure storage lagoon.	
Describe where water comes from that is used to clean and/or flush:	
CSD uses a hose to wash down the milking parlor with clean well water.	
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:	
The pit at the southeast corner was first designed to collect the first ¼ inch. However, it was reconstructed to have less of a steep pitch and catches most of the wastewater which is pumped directly to the manure storage lagoon. Any wastewater that does not flow into the pump flows to the engineered grass infiltration depression which has no outlet.	
If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:	
Plate cooler water goes to the flush pit and then to the digester. All liquid from the digester goes to the manure storage lagoon.	
If a dairy, describe how process wastewater from the cleaning of the milking parlor is collected and disposed of at the facility:	

Wastewater from the cleaning of the milking parlor goes to the flush pit then to the digester and all liquid from the digester goes to the manure storage lagoon.	
If a dairy, describe how process wastewater from the cleaning of the milk tanks is disposed of at the facility:	
Wastewater from the cleaning of the milking parlor goes to the flush pit then to the digester and all the liquid from the digester goes to the manure storage lagoon.	
If a dairy, how many times per day are cows milked?	Three times per day

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes
When was the last time a sample was taken of the manure and/or process wastewater?	Test regularly
Describe the process to take the manure and/or process wastewater sample.	From manure storage lagoon with long stick when pumping
Number of acres available for land application:	7200 acres
Are land application records kept?	Yes
Who applies the manure and process wastewater to the fields?	(b)(6) keeps records. (b)(6) – (b)(6) do the land applications
Are weather conditions at time of application kept? (24 before – 24 after)	No, this information is not kept.
Does the facility perform and keep records of the soil testing?	Yes, annually as required by the NMP.
Is manure transferred off-site to another party?	No
Are manure transfer records maintained?	NA
Do facility personnel perform periodic inspection of land application equipment?	Yes – (b)(6) is the person who conducts the land application equipment inspections.

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
No surface flow was observed leaving the production area.	
How many months out of the year is there flow in the nearest surface water pathway:	Petenwell Lake has water in it year-round.
Are there any storm water pathways entering the facility?	No
Are there any clean water ponds on site?	Yes, there are two clean water ponds on site.
What is the name of the first waterway that is identified as a Traditional	Wisconsin River

Navigable Water (TNW) for surface flow from the facility?	
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Perennial
Is the surface water nearest to the facility considered to be impaired?	Yes, for total phosphorus

EPA sent an e-mail prior to the inspection requesting documents that would assist EPA in answering questions for the review of permit compliance and the Nutrient Management Plan. Attachment E contains the Documents received during the inspection.

Tables 8 through 11 reflect information provided by CSD personnel and based on EPAs review of records.

Table 8: WPDES Permit and Nutrient Management Plan

NMP on site?	Yes
Date NMP Submitted:	2012
Planner Name/Company:	(b) (6)
Date that the NMP was last updated:	3/31/2017
Storage Description:	In the plan specs from 2006, there is a description of the as-built of the Digester built in 2007. No additional storage designs were on site. CSD personnel stated that WDNR would have a copy.
Amount of Manure Generated:	In 2017, the expected amount of manure and process wastewater produced on annual basis was 37,500,200 gallons and 14,472 tons. Expect to apply 58,637,000 gallons and 22,055 tons.
Capacity of Storage:	22-million-gallon manure storage lagoon
Duration of Storage:	Six months
Amount of Spreadable Land:	Approximately 7200 acres
Mortality Management Plan:	Invoices from renderer
Clean Water Diversion System:	Yes, roof water goes to vegetated areas between the barns and infiltrates into the ground.
Direct Contact Prevention Plan:	Yes, mature milking and dry cows are kept in barns.
Chemical Management Plan:	Room where chemicals are kept has a drain that discharges to the manure storage lagoon.
Conservation Practices:	Listed in the NMP
Manure Testing Protocols:	Protocols are in the Permit
Soil Testing Protocols:	Protocols are in the Permit
Land Application Protocols:	Permit and NMP. NMP for 2017 reads that spreading will occur in spring before planting, both liquid and solid manure. Summer applications will be made only to fields that receive a fall cover

	crop, surface applied on cover crop using airway bar, or applied with a nitrification inhibitor. Summer applications with center pivot irrigation to growing crops, will be utilized to reduce the potential for nutrient leaching. There will be a planned winter application of liquid manure. Solid manure may be applied in winter. The prohibition period of February and March will be followed if the ground is snow covered and/or frozen.
Additional NMP comments:	EPA was told that applications using irrigation were not being done, but is still written in the NMP. February and March application of manure is prohibited according to NR 243.
Does the NMP reflect the current operational characteristics?	No. The 2017 NMP Narrative mentions that irrigation is a method of land application. According to the Central Sands Personnel, they have not irrigated in three years.
Are the number of acres owned/leased consistent with what is listed in the NMP?	The listed fields total 7413.5 acres. The NMP lists 7460.0 acres.

Table 9: Land Application Records (details of the records reviewed)

Note that EPA requested written documentation of land application records. (b)(6) stated that the information is initially hand-written and then transferred from hand-written to a spreadsheet (b)(6), CSD Legal Counsel, said that the facility did not have the hand written documentation of land application records.

Fields available for application 2017:	Snap Plus Spreading Plan Report identifies fields for application in 2017.
Timing limitation on fields:	The NMP narrative includes some of the restrictions of application based on season and method of application. The SnapPlus Spreading Plan Report identifies amount of manure and type of manure to be applied by season.
Annual manure analysis for N and P	Yes
Soil tests for fields (for P) less than 5 years old?	Yes
Inspection of land application equipment documentation:	It is broadly written in the Nutrient Management Plan.
Crop:	Several different documents in Snap Plus
Application Rate:	Calculated in Snap Plus
Crop Yield Goals:	Planned yields are used in Snap Plus
Timing of land application:	The planned season for land application is in documents generated by Snap Plus
Method of land application:	Documents are generated in SnapPlus.

Additional land application information:	In the NMP there is a “NMP Adaptive Nitrogen Management” 2016.pdf, but a letter from CSD attorney stated that the adaptive nitrogen management plan would not be followed.
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Table 10: Facility Records (details of the records reviewed)

Diversion devices:	Infiltration ponds
Impoundments:	Manure storage lagoon and two storm water ponds are listed in the site plans and aerial photographs.
Depth marker observations:	Yes
Water Lines:	Yes
Mortality handling:	Yes
Storage Structure Design:	Yes
Overflow records:	None recorded
Crop Yields:	No – Only planned yields were available for review.
Land Application Dates:	The following SnapPlus records include dates for land application: Daily log reports, Annual Spreading Reports and sometimes dates of land application are included in the Snap Plus Spreading and Nutrient Management Sorted by Crop Report.
Weather Conditions at time of application (24 before-24 after):	None recorded.
Test Methods for Manure Testing:	The laboratory report for the manure analysis does not include the method of analysis.
Test Methods for Soil Testing:	The Snap Plus reports for the soil tests do not include the method used for analyzing the soil tests.
Manure Test Results:	Yes, results were provided in the NMP for 2016, but not for 2017. According to NR 243, manure samples are to be analyzed for the month that manure is applied to the fields.
Soil Test Results:	Yes, results are provided, but not all fields that received manure had annual soil test results.
Calculations of N and P applied:	Calculations are done in Snap Plus
Application Methods:	NMP identifies methods of application.
Application Equipment Inspection Dates:	This has been recorded, but the form does not specifically identify what equipment is being inspected.

Table 11: NPDES Permit

Type of permit	Individual
Is a copy of the permit on site?	Yes
Date that the permit was issued:	Amended permit was issued July 7, 2016.
Date that the permit will expire:	Permit expired on December 31, 2016. Wisconsin DNR has not re-issued the permit, which is still under review.
Permitted number of animal units:	Permitted as a large CAFO. The NMP identifies that the number of animals = 4535 (milking =3575+ dry =550+ Heifer = 350+ calves =60)
Does the permit contain a compliance schedule? If yes, provide a detailed description of the requirements and the status.	Yes, Attachment C contains the permit compliance schedule. EPA did not conduct a full review of the compliance schedule requirements.
Have there been any changes made to the production area since the permit was issued? If yes, provide a detailed description.	No
Are there any practices in the permit that are not being done at the facility? (Records kept, inspections performed, etc.)	Yes, Areas of Concern were discussed with CSD in the closing conference. Attachment D lists the Areas of Concern from the NMP file review.

4.0 WALK-THROUGH OF THE FACILITY

Cheryl Burdett, Joan Rogers, Carla Valdes, and Andi Hodaj met with Wisconsin Department of Natural Resources (WDNR) at a gas station in Nekoosa, Wisconsin at 8:30 AM. After coordinating with WDNR, EPA and WDNR drove to Central Sands Dairy, LLC and arrived at 9:00 AM.

At the facility's office, the inspection team was greeted by CSD's Attorney, CSD's Dairy Manager, and CSD's Farm Manager.

EPA began the inspection by asking which permit was effective and then going through the checklist. CSD's attorney said that they were following the July 7, 2016 modified permit, except for the provision in the permit that was being appealed by CSD.

Using an aerial photograph, EPA asked CSD representatives to identify all the buildings in the aerial photograph (Attachment A).

Clean water around the barns is directed through topography from the barns towards the grassed water areas in front of the barns and water does not leave the grassed areas. (Attachment B, Photo Log)

CSD's Farm Manager stated that they have not had any overflows from the manure storage lagoon and that they would never allow it to overflow. There is also a grassed

depression area next to the manure storage lagoon that captures overflows that may result from a significant rain event.

Manure has only been applied via injection in the past three years, according to CSD's

(b)(6)

EPA finished the checklist and items at 9:57 AM. EPA donned their biosecurity boots and started the walk-through of the facility at 10:10 AM heading east and then north toward the manure storage lagoon (P6210155 through P6210159) where they observed the gauge for the Maximum Operating Level (MOL) of the manure storage lagoon. EPA continued towards two of the wells, CSD-1S and CSD-1D (P6210161 through P6210164). EPA walked back north toward the bagged silage stored north of the manure storage lagoon. EPA observed the bagged silage on the south side of the production area. EPA noted in the photo log that CSD-6 is approximately 100 feet from northeast corner of the manure storage lagoon (P6210171). EPA continued to the north and walked around the bagged silage area and the digester (P6210169, P6210170, P6210172 through P6210175). Sand storage was located to the north of the silage bunker and west of the bagged silage (P6210176 and P6210178). EPA observed monitoring well CSD-7 at the northwest corner of the lagoon (P6210180). The concrete pad that stored biosolids and feed was graded to slant toward the manhole to collect leachate (P6210181 and P6210182). EPA observed the location of monitoring well CSD-8 located at the northwest corner of the digester. EPA looked inside the sand separator building and CSD explained the sand separation process as EPA observed (P6210187 through P6210190). EPA walked toward monitoring well CSD-4 located north of the north barn. EPA observed monitoring wells CSD-4 (P6210195) and CSD-3D located in the northwest corner of the north barn. EPA continued to the south where process water is collected from the holding area and south barn and milking parlor.

As EPA was walking around Stormwater Pond 1 and Stormwater Pond 2, EPA did not observe process wastewater from the barns or silage pads entering the stormwater ponds. EPA was told by CSD that water within the stormwater ponds infiltrates into the ground (P6210212 through P6210220). EPA walked through the silage bunkers located east of Stormwater Pond 2 and west of manure storage lagoon. The silage bunker is bermed and the pit that collects the leachate had some feed on top of the pit and leachate from the silage was on the outside of the pit (P6210221 through P6210224). However, any process wastewater from the silage bunker that did not make it into the pit flowed into the engineered grass depression where it was designed to infiltrate into the ground. The walk-through of the production area ended at monitoring well CSD-5. EPA then walked back to the office at approximately 12:00 PM.

4.1 Closing Conference

The EPA and WDNr Inspection Teams went for lunch and returned to the facility at 1:20 PM. EPA entered the office at 1:30 PM for a closing conference with CSD and the WDNr Inspection Team. EPA requested the design plans of the manure storage lagoon and CSD said that they do not have it on-site, but that WDNr would have it. EPA also requested a clean water diversion schematic, but CSD did not have one on-site. The

closing conference concluded at 2:30. At this point, WDNR left and EPA started scanning documents to review CSD's Nutrient Management Plan for review to be completed in EPA's office later.

Table 12: Areas of Concern discussed with CSD during Closing Conference

Were specific "Areas of Concern" discussed with facility personnel?	Yes
Who were the Areas of Concern discussed with? CSD Personnel	
<p>AREAS OF CONCERN DISCUSSED:</p> <ol style="list-style-type: none"> 1. According to SnapPlus Soil Tests Records : Some fields had only 1 sample recorded. NR 243 requires one sample for every 5 acres. Recorded number of samples for the following fields were not done according to the recommended number: <ol style="list-style-type: none"> a. 4/20/2016 at Field CF01 – required number of samples 27. Actual number of samples taken was 1. b. 4/20/2016 at Field CF02 – required number of samples 15. Actual number of samples taken was 1. 2. Annual Soil sampling required by CSD's Permit: <ol style="list-style-type: none"> a. N02 – no soil tests were taken for 2016 b. N05 – no soil tests were taken in 2015 and 2016 c. N10 – no soil tests were taken in 2015 and 2016 d. N15 – no soil tests were taken in 2015 and 2016 e. N23 – no soil tests were taken in 2015 and 2016 f. N24 - no soil tests wee taken in 2015 and 2016 g. N41 - no soil tests were taken in 2015 and 2016 h. Basse South – 3/17/2016 - no soil test, no lab number i. N33 – no soil tests for 2014 and 2015 j. N46 – No soil tests for 2014, 2015 and 2016 3. The soil tests collected on 10/27/2014 and 10/27/2015 were for soil test results for years 2015 and 2016. The information recorded for these dates included the exact same lab numbers and lab results. The soil samples are required to be collected and analyzed annually for CSD fields. Without the correct data entered for Soil Test P, EPA could not determine in 2015 if soil tests reached 200 ppm or if CSD has applied phosphorus at a rate that will not exceed the phphosphorus 50% uptake rate for 4 years for fields that have soil tests over 100 ppm. The following fields are missing the soil test information for one of the two years: CASINO N, CASINO S, ELSEN, ELSEN North, N01-N 14; N18-22; N25-27; N29-63; RDO 01E, RDO 01W, RDO 02N, RDO 03, RDO 04N, RDO 06E, RDO 06W, RDO 07E, RDO 08, RDO 09E, RDO 09W, RDO 10, RDO 11N, RDO 11S, RDO 12N, RDO 13E, RDO 13W, RDO 14, RDO 15, RDO 16, RDO 17E, RDO 17W, RDO 18N, RDO 18S, RDO 19E, RDO 19W, RDO 19S, RDO 20, RDO 21N, RDO 21S, RDO 22 4. Actual lab data was not provided for soil tests and manure tests. CSD stated that EPA must request this data from the Lab. 5. EPA reviewed documents in SnapPlus to assess CSD's NMP for compliance. EPA noted during the NMP review of the SnapPlus documents that SnapPlus is using the total acres for land application of the field and not the actual acres that 	

were applied to. This could potentially lead to over-application because the acreage is less than what is actually being reported.	
Exit Time:	EPA completed the production area inspection at 2:30 PM and began scanning and photographing documents until approximately 5:30 PM on 6/21/2017. EPA returned to scan and photograph documents on 6/22/2017. EPA completed the file collection at approximately 10:30 AM on 6/22/2017.
Disposable Boots Left at Facility?	Yes

Table 13: Waterway Documentation

List the pathway taken by EPA inspectors to document the waterway at the facility.
EPA did not walk waterways because we did not observe runoff leaving the production area.

Table 14: Sampling Information

Were samples taken?	No
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4.2 NMP File Collection:

EPA requested that CSD provide their Nutrient Management Plans to EPA at the time of the inspection. CSD provided EPA with hard copies of their Nutrient Management Plans, which EPA had to scan and photograph in order to be able to review back at EPA's office. As EPA was scanning and photographing NMPs, EPA noted that weather records for 24 hours prior to land application and 24 hours after land application were not within the documents. EPA asked if weather was recorded. CSD's Farm Manager stated that they subscribed to the Great Lakes Weather Service with the closest raing gauge being in Wassau, Wisconsin. CSD, at the time of inspection, did not produce weather records for 24 hours prior to land application and 24 hours after land application.

4.3 NMP Post-Inspection Finding:

EPA reviewed the documents provided by CSD during the June 21 through June 22, 2017 inspection and documents downloaded from the WDNR's e-permitting website. EPA's review of the documents identified approximately 205 instances of land application practices or reporting issues between 2015 and 2017 that were inconsistent with CSD's WPDES Permit and NMP. These findings are found in Attachment D Table 1 through Table 5.

ATTACHMENT A

PHOTO LOG

June 21, 2017

Central Sands Dairy LLC

EPA Inspection 6/21/2017

All photos taken by Cheryl Burdett, CAFO Program Manager, EPA

Walk-through with photos started at 10:10 AM – 1:20 PM

Photo Log done by Andi Hodaj, EPA

Camera: Olympus Tough F2.0 (time was not listed below because the camera was not recording correct time)



1: P6210154

Description: Within the blue box is the vegetated depression area on the south side of the manure storage lagoon that served as a collection area in case of overflows from the manure storage lagoon. There was a hole of about 1ft diameter in the middle of the vegetated depression.

Location: South side of the manure storage lagoon

Camera Direction: West

Date: 6/21/2017



2: P6210155

Description: Manure storage lagoon.

Location: Southeast corner of the manure storage lagoon

Camera Direction: West

Date: 6/21/2017



3: P6210156

Description: Arrow depicts the pumping unit, on the east bank of the manure storage lagoon.

Location: Southeast corner of the manure storage lagoon

Camera Direction: North

Date: 6/21/2017



4: P6210157

Description: Manure storage lagoon.

Location: Southeast corner of the manure storage lagoon

Camera Direction: Northwest

Date: 6/21/2017



5: P6210158

Description: Arrow is pointing to the Maximum Operating Level (MOL) marker on the south bank of the manure storage lagoon.

Location: Southeast corner of the manure storage lagoon

Camera Direction: South

Date: 6/21/2017



6: P6210159

Description: The red arrow shows the MOL marker on the south bank of of the manure storage lagoon.

Location: Southeast corner of the manure storage lagoon

Camera Direction: South

Date: 6/21/2017



7: P6210160

Description: Looking east of the manure storage lagoon the red arrow points to where there is a drainage pipe under the dirt road for the manure storage lagoon that allows storm water to flow into the vegetated depression area on the south side the manure storage lagoon.

Location: Southeast corner of the manure storage lagoon

Camera Direction: Southeast

Date: 6/21/2017



(b) (6)



8: P6210161

Description: Wells CSD-1S and

Location: Southeast corner of the

Camera Direction: East

Date: 6/21/2017



9: P6210162

Description: Wells CSD-1S and CSD-1D.

Location: Approximately 200 feet east of the southeast corner of the manure storage lagoon

Camera Direction: East

Date: 6/21/2017



10: P6210163

Description: Well CSD-1S.

Location: Approximately 200 feet east of the southeast corner of the manure storage lagoon

Camera Direction: Down

Date: 6/21/2017



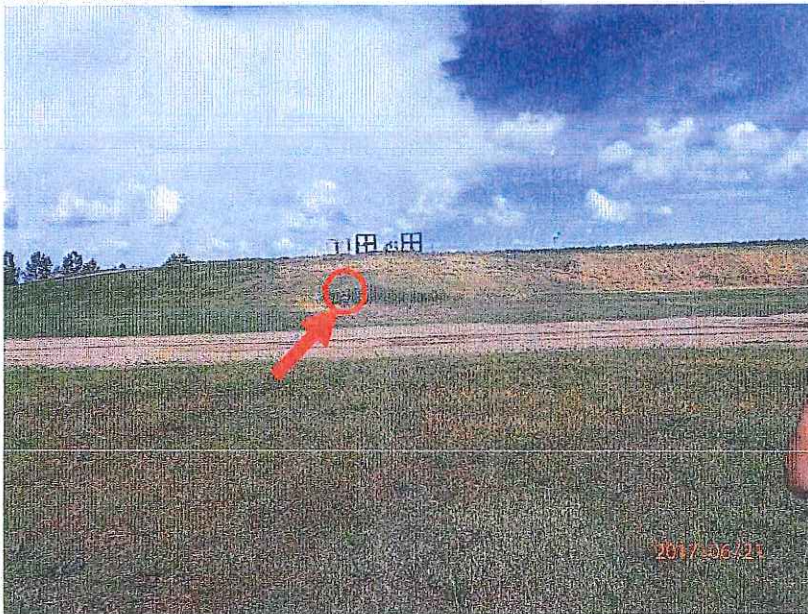
11: P6210164

Description: Well CSD-1D.

Location: Approximately 200 feet east of the southeast corner of the manure storage lagoon

Camera Direction: Down

Date: 6/21/2017



12: P6210165

Description: There is a manhole and pumping equipment on the east outer bank of the manure storage lagoon from which manure is pumped.

Location: Approximately 150 feet east of the manure storage lagoon

Camera Direction: West

Date: 6/21/2017



(b) (6)

13: P6210166

Description: Crop fields north and east of Central Sands Dairy, LLC.

Location: Approximately 150 feet east of the manure storage lagoon

Camera Direction: Northeast

Date: 6/21/2017



14: P6210167

Description: Well CSD-9.

Location: Approximately 150 feet east of the manure storage lagoon

Camera Direction: Down

Date: 6/21/2017



15: P6210168

Description: Looking at the north bank of the manure storage lagoon. Red arrow depicts the location of a hose going into the manure storage lagoon.

Location: Northeast corner of the manure storage lagoon

Camera Direction: West

Date: 6/21/2017



16: P6210169

Description: Looking west at bagged silage and commodity building.

Location: Northeast corner of the manure storage lagoon

Camera Direction: West

Date: 6/21/2017



17: P6210170

Description: Bagged silage located on north side of the manure storage lagoon.

Location: Northwest corner of the manure storage lagoon

Camera Direction: North

Date: 6/21/2017



18: P6210171

Description: Well CSD-6.

Location: Approximately 100ft from the northeast corner of the manure storage lagoon

Camera Direction: North

Date: 6/21/2017



19: P6210172

Description: Empty area between the bagged silage north of the manure storage lagoon.

Location: Aproximately 500ft from the north bank of the manure storage lagoon

Camera Direction: Southeast

Date: 6/21/2017



20: P6210173

Description: Empty area between the bagged silage north of the manure storage lagoon.

Location: Aproximately 500ft from the north bank of the manure storage lagoon

Camera Direction: South

Date: 6/21/2017



21: P6210174

Description: Digester west of the bagged silage.

Location: Digester

Camera Direction: West

Date: 6/21/2017



22: P6210175

Description: Digester west of the bagged silage.

Location: Digester

Camera Direction: West

Date: 6/21/2017



23: P6210176

Description: Access point to the clean water pipes that go into the digester.

Location: Southeast corner of the digester

Camera Direction: South

Date: 6/21/2017



24: P6210177

Description: Area south of the digester. It slopes north towards the digester.

Location: Southeast of the digester

Camera Direction: Southwest

Date: 6/21/2017



25: P6210178

Description: Sand storage area.

Location: South of the digester

Camera Direction: North

Date: 6/21/2017



26: P6210179

Description: Well CSD-7.

Location: Northwest corner of the manure storage lagoon

Camera Direction: South

Date: 6/21/2017



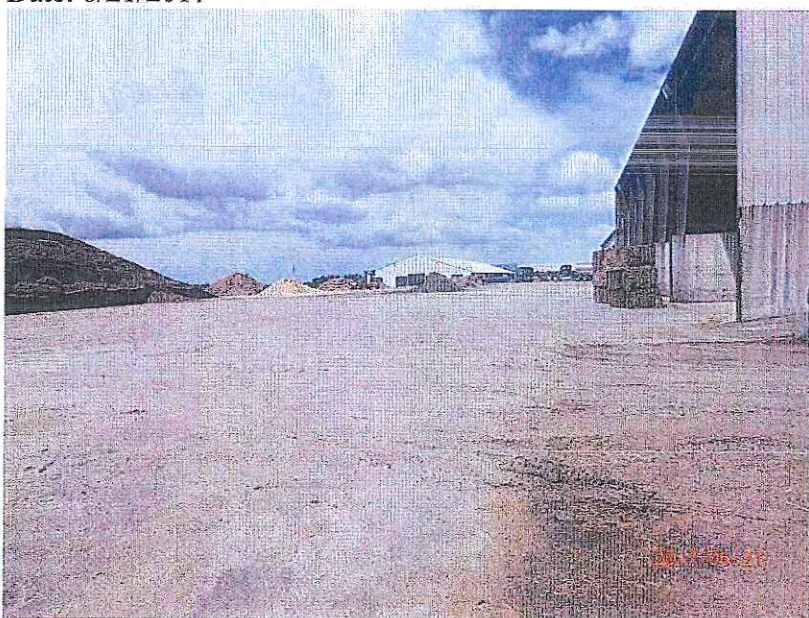
27: P6210180

Description: Silage bunker.

Location: West of the manure storage lagoon

Camera Direction: South

Date: 6/21/2017



28: P6210181

Description: Silage bunker.

Location: West of the manure storage lagoon

Camera Direction: West

Date: 6/21/2017



29: P6210182

Description: Manhole next to the sand storage area.

Location: South of the digester

Camera Direction: Down

Date: 6/21/2017



30: P6210183

Description: Area draining to the manhole in photo 29 above.

Location: South of the digester

Camera Direction: West

Date: 6/21/2017



31: P6210184

Description: Sand storage area in front of the sand separator building. Process wastewater flows east.

Location: Sand storage area south of the sand separator building

Camera Direction: East

Date: 6/21/2017



(b)
(6)

32: P6210185

Description: Sand separator building.

Location: Sand separator building

Camera Direction: North

Date: 6/21/2017



33: P6210186

Description: Sand storage area in front of the sand separator building. Process water flows east.

Location: Sand storage area south of the sand separator building

Camera Direction: East

Date: 6/21/2017



34: P6210187

Description: Digester for the sand mix next to the sand separator building. It receives process wastewater water from the cleaning of the milking parlor.

Location: Sand separator building

Camera Direction: North

Date: 6/21/2017



35: P6210188

Description: Inside the sand separator building.

Location: Inside the sand separator building

Camera Direction: North

Date: 6/21/2017



36: P6210189

Description: Inside the sand separator building.

Location: Inside the sand separator building

Camera Direction: West

Date: 6/21/2017



37: P6210190

Description: Inside the sand separator building.

Location: Inside the sand separator building

Camera Direction: North

Date: 6/21/2017



38: P6210191

Description: Grassed area between the south and north barns.

Location: East end of the south and north barns

Camera Direction: West

Date: 6/21/2017



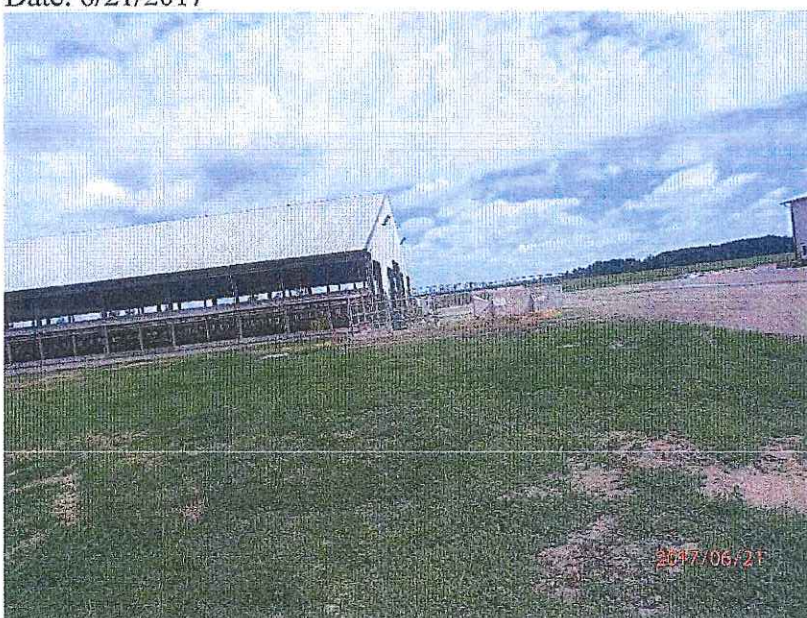
39: P6210192

Description: East end of the south barn.

Location: East end of north barn

Camera Direction: South

Date: 6/21/2017



40: P6210193

Description: East end of the north barn.

Location: East end of the south barn

Camera Direction: North

Date: 6/21/2017



41: P6210194

Description: Well CSD-8.

Location: Northwest corner of the digester

Camera Direction: Southeast

Date: 6/21/2017



42: P6210195

Description: Well CSD-4.

Location: North of the north barn

Camera Direction: South

Date: 6/21/2017



43: P6210196

Description: Well CSD-3S.

Location: Northwest corner of the north barn

Camera Direction: North

Date: 6/21/2017



44: P6210197

Description: Well CSD-3D.

Location: Northwest corner of the north barn

Camera Direction: North

Date: 6/21/2017



45: P6210198

Description: The west side of the north barn.

Location: The west side of the north barn

Camera Direction: East

Date: 6/21/2017



46: P6210199

Description: Area west of the north and south barns.

Location: The west side of the north barn

Camera Direction: South

Date: 6/21/2017



47: P6210200

Description: West end of the north barn.

Location: The west side of the north barn

Camera Direction: North

Date: 6/21/2017



48: P6210201

Description: Pit outside of the north barn.

Location: The west side of the north barn

Camera Direction: Down

Date: 6/21/2017



49: P6210202

Description: West end of the south barn.

Location: West side of the two barns

Camera Direction: South

Date: 6/21/2017



50: P6210203

Description: Clean sand pile between the south barn and the maternity barn on the west side.

Location: West side of the barns

Camera Direction: East

Date: 6/21/2017



51: P6210204

Description: Maternity barn.

Location: West side of the maternity barn

Camera Direction: Southeast

Date: 6/21/2017



52: P6210205

Description: Former calf area and the red arrow depicts the location of the mortality barn.

Location: Southwest end of the maternity barn

Camera Direction: Southwest

Date: 6/21/2017



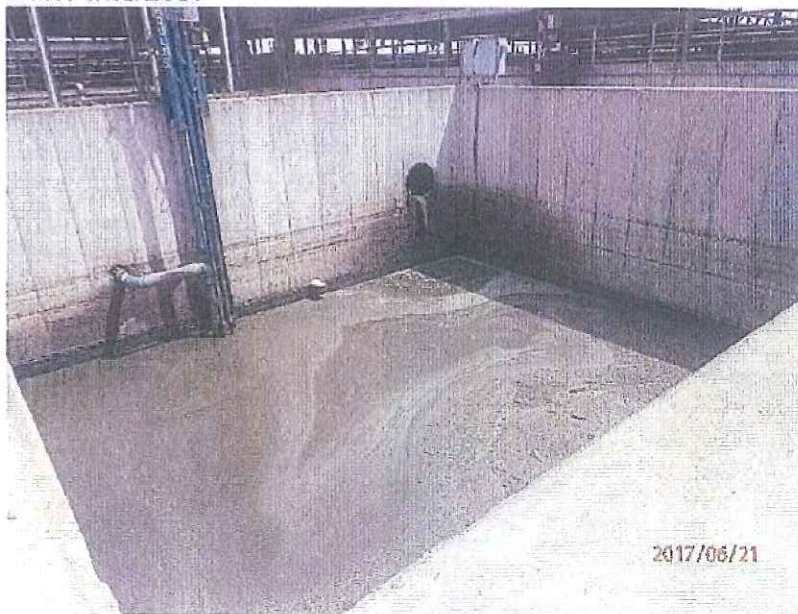
53: P6210206

Description: Former calf area and the red arrow indicates the location of the mortality barn.

Location: Southwest end of the maternity barn

Camera Direction: Southwest

Date: 6/21/2017



54: P6210207

Description: Pit between the south barn and the milking parlor. The pump on the northside pumps to the digester.

Location: South of the south barn

Camera Direction: Northeast

Date: 6/21/2017



55: P6210208

Description: Pit between the south barn and the milking parlor. The pump on the north side of the pit pumps to the digester.

Location: South of the south barn

Camera Direction: North

Date: 6/21/2017



56: P6210209

Description: Pit between the south barn and the milking parlor. South pump used to flush out the milking parlor.

Location: South of the south barn

Camera Direction: East

Date: 6/21/2017



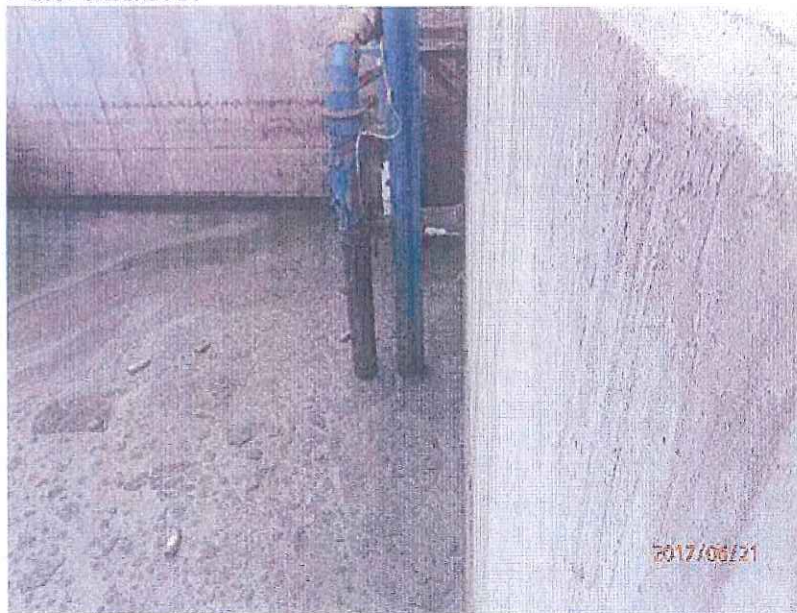
57: P6210210

Description: Pit between the south barn and the milking parlor. South pump used to flush out the milking parlor.

Location: South of the south barn

Camera Direction: East

Date: 6/21/2017



58: P6210211

Description: Pit between the south barn and the milking parlor. South pump used to flush out the milking parlor.

Location: South of the barn

Camera Direction: Down

Date: 6/21/2017



59: P6210212

Description: Stormwater Pond 1 on the south side of the milking parlor. It receives rain water runoff.

Location: South of the milking parlor

Camera Direction: South

Date: 6/21/2017



60: P6210213

Description: Pipe in Stormwater Pond 1 (aka Stormwater Pond – west) comes from the milking parlor roof gutters.

Location: South of the milking parlor

Camera Direction: Southwest

Date: 6/21/2017



61: P6210214

Description: Pipe in Stormwater Pond 1 (aka Stormwater Pond-west) comes from the milking parlor roof gutters.

Location: South of the milking parlor

Camera Direction: South

Date: 6/21/2017



62: P6210215

Description: Pipe in Stormwater Pond 1 (aka Stormwater Pond – west) comes from the milking parlor roof gutters.

Location: South of the milking parlor

Camera Direction: Down

Date: 6/21/2017



63: P6210216

Description: Stormwater Pond 2 (aka Stormwater Pond – East)

Location: East end of Stormwater Pond 1

Camera Direction: East

Date: 6/21/2017



64: P6210217

Description: Well CSD-2.

Location: South of the Stormwater Pond 2 (aka Stormwater Pond – East)

Camera Direction: South

Date: 6/21/2017



65: P6210218

Description: Bagged silage east of Stormwater Pond 2. Jeff Wysocki and Adam Onan stated that the this area does not slope towards the pond.

Location: Northeast corner of Stormwater Pond 2

Camera Direction: Northeast

Date: 6/21/2017



66: P6210219

Description: Dug out channel on the north bank of Stormwater Pond 2.

Location: Northeast corner of Stormwater Pond 2

Camera Direction: Northwest

Date: 6/21/2017



67: P6210220

Description: Stormwater Pond 2.

Location: Northeast corner of Stormwater Pond 2

Camera Direction: West

Date: 6/21/2017



68: P6210221

Description: Pit that receives runoff from the feed storage area, on the southwest corner of the manure storage lagoon.

Location: Southwest corner of the manure storage lagoon

Camera Direction: North

Date: 6/21/2017



69: P6210222

Description: Pit that receives runoff from the feed storage area.

Location: Southwest corner of the manure storage lagoon

Camera Direction: North

Date: 6/21/2017



70: P6210223

Description: Runoff collection area south of the feed storage area that directs runoff towards the pit in photos 68, 69.

Location: Southwest corner of the manure storage lagoon

Camera Direction: West

Date: 6/21/2017



71: P6210224

Description: Pit that receives runoff from the feed storage area.

Location: Southwest corner of the manure storage lagoon

Camera Direction: Down/North

Date: 6/21/2017



72: P6210225

Description: Well CSD-5.

Location: South of the office

Camera Direction: Southeast

Date: 6/21/2017

ATTACHMENT B

**SITE LAYOUT AND PROPOSED
TOPOGRAPHY
FACILITY DEVELOPMENT PLAN**

ATTACHMENT C

PERMIT COMPLIANCE SCHEDULE

5 Summary of Reports Due

FOR INFORMATIONAL PURPOSES ONLY

Description	Date	Page
Annual Reports -Submit Annual Report #1	January 31, 2012	17
Annual Reports -Submit Annual Report #2	January 31, 2013	17
Annual Reports -Submit Annual Report #3	January 31, 2014	17
Annual Reports -Submit Annual Report #4	January 31, 2015	17
Annual Reports -Ongoing Annual Reports	January 31, 2016	17
Nutrient Management Plan -Management Plan Submittal	March 31, 2012	17
Nutrient Management Plan -Management Plan Annual Update #1	March 31, 2012	17
Nutrient Management Plan -Management Plan Annual Update #2	March 31, 2013	17
Nutrient Management Plan -Management Plan Annual Update #3	January 31, 2014	17
Nutrient Management Plan -Management Plan Annual Update #4	March 31, 2015	17
Nutrient Management Plan -Ongoing Management Plan Annual Updates	March 31, 2016	17
NR243.15(6) and Spray Irrigation of Manure or Process Wastewater -Spray Irrigation and NR 214	June 30, 2012	17
Production Area Monitoring - Groundwater Monitoring Well Installation - Monitoring Well Plans and Specifications	See Permit	18
Production Area Monitoring - Groundwater Monitoring Well Installation - Monitoring Well Installation	August 31, 2016	18
Production Area Monitoring - Groundwater Monitoring Well Installation - Monitoring Well Sampling	July 15, 2016	18
Production Area Monitoring - Groundwater Monitoring Well Installation - Monitoring Well Sampling	August 15, 2016	18
Production Area Monitoring - Groundwater Monitoring Well Installation - Monitoring Well Sampling	September 15, 2016	18
Production Area Monitoring - Groundwater Monitoring Well Installation - Monitoring Well Sampling	October 15, 2016	18
Production Area Monitoring - Groundwater Monitoring Well Installation - Monitoring Well Sampling	November 15, 2016	18
Production Area Monitoring - Groundwater Monitoring Well Installation - Monitoring Well Sampling	December 15, 2016	18
Production Area Monitoring - Groundwater Monitoring Well Installation - Monitoring Well Sampling	See Permit	18

Report forms shall be submitted to the address printed on the report form. Any facility plans or plans and specifications for municipal, industrial, industrial pretreatment and non industrial wastewater systems shall be submitted to the Bureau of Watershed Management, P.O. Box 7921, Madison, WI 53707-7921. All other submittals required by this permit shall be submitted to:

WPDES Permit No. WI-0063533-02-1
Central Sands Dairy LLC

West Central Region, 1300 W. Clairemont Ave., P.O. Box 4001, Eau Claire, WI 54702-4001

ATTACHMENT D

NMP COMPLIANCE REVIEW AREAS OF CONCERN

Table 1: 2017 Nitrogen Application Rates

Table 1A: 2017 Additional Land
Application Concerns

Table 2: 2016 Nitrogen Application Rates

Table 3: 2015 Nitrogen Application Rates

Table 4: 2013-2016 Four Year Average
Uptake Rates of Phosphorus

Table 5: 2017 Insufficient Number of Soil
Samples Taken based on Acreage

The SnapPlus Report titled "SnapPlus Application Restriction Compliance Check" dated 3/19/2018 identifies the exceedances below. EPA also reviewed "SnapPlus Spreading and Nutrient Management Sorted by Crop Report" to confirm application rates.

Table 1: 2017 Nitrogen Application Rates

Field Name	Prior Crop Year 2016	Crop Year 2017	Recommended Rate 2017 of Total Nitrogen (lbs./acre)	Actual Rate of Total Nitrogen (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	NRCS 590 Manure Application Rate on fields with High Leaching Potential (lbs./acre)	Exceeds Rate of Manure application for Nitrogen (lbs./acre)
N25	Snapbeans late plant to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	255	105	150	120	30
N26	Snapbeans late plant to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	255	106	149	120	29
N33	Peas to Snapbean to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	251	82	169	120	39
N34	Snapbean to snapbean to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	253	83	170	120	50
N44	Snapbean to Snapbean to	Potatoes, late harvest, to	250	258	135	123	120	3

Field Name	Prior Crop Year 2016	Crop Year 2017	Recommended Rate 2017 of Total Nitrogen (lbs./acre)	Actual Rate of Total Nitrogen (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	NRCS 590 Manure Application Rate on fields with High Leaching Potential (lbs./acre)	Exceeds Rate of Manure application for Nitrogen (lbs./acre)
	small grain cover	small grain cover crop						
N56	Potatoes, late harvest, to small grain cover crop	Corn silage to small grain cover crop	215	219	67	152	120	32
RDO 09W	Snapbean to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover crop	250	251	128	123	120	3
RDO 14	Snapbean to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover	250	252	88	164	120	44
RDO 17E	Peas to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover crop	250	249	64	185	120	65
RDO 19W	Sweet Corn early plant (before May 20) with small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	256	88	168	120	48

TABLE 1A: 2017 Additional Land Application Concerns

Field Name	Date of Application	Amount of Manure reported in daily log (tons or gallons)	Amount of Manure Reported in SnapPlus Spreading and Nutrient Management Sorted by Crop Report 3/19/2018	Type of Manure	Concern
RDO 18 S	8/22/2016	1,152,093 gallons	Not reported	Liquid	This application amount of manure was different or not reported in 2016 Annual Spreading Report or SnapPlus Nutrient Management Sorted by Crop Report for Crop year 2017
N54	8/26/2016	1,517,089 gallons	1,517,025 gallons	Liquid	Difference of 64 gallons
N44	8/29/2016	1,542,142 gallons	1,542,075	Liquid	Difference of 67 gallons
RDO19 W1/2	9/15/2016	1,871,335 gallons	1,871,310	Liquid	Difference of 25 gallons
N33	9/19/2016	1,694,978 gallons	1,694,940 gallons	Liquid	Difference of 38 gallons
N34	9/24/2016	1,699,188 gallons	1,699,140 gallons	Liquid	Difference of 48 gallons

Field Name	Date of Application	Amount of Manure reported in daily log (tons or gallons)	Amount of Manure Reported in SnapPlus Spreading and Nutrient Management Sorted by Crop Report 3/19/2018	Type of Manure	Concern
RDO 14	9/25/2016	981,881 gallons	981,864 gallons	Liquid	Difference of 17 gallons
RDO 17 E1/2	9/28/2016	2,473,034 gallons	2,472,960 gallons	Liquid	Difference of 74 gallons
N52	10/2/2016	2,110,349 gallons	2,110,275 gallons	Liquid	Difference of 74 gallons
N51	10/6/2016	1,242,445 gallons	1,242,375 gallons	Liquid	Difference of 70 gallons
N55	10/9/2016	1,242,445 gallons	1,076,725 gallons	Liquid	Difference of 165,720 gallons
N43	10/11/2016	1,516,122 gallons	1,516,050 gallons	Liquid	Difference of 72 gallons
N56	10/14/2016	1,898,403 gallons	1,645,280 gallons	Liquid	Difference of 253,123 gallons
N25	10/16/2016	1,500,161 gallons	1,500,120 gallons	Liquid	Difference of 41 gallons
N26	10/18/2016	1,494,834 gallons	1,494,780 gallons	Liquid	Difference of 54 gallons
N35	10/20/2016	803,197 gallons	803,160 gallons	Liquid	Difference of 37 gallons
N36	10/25/2016	803,197 gallons	803,160 gallons	Liquid	Difference of 37 gallons

Field Name	Date of Application	Amount of Manure reported in daily log (tons or gallons)	Amount of Manure Reported in SnapPlus Spreading and Nutrient Management Sorted by Crop Report 3/19/2018	Type of Manure	Concern
N27	10/31/2016	758,803 gallons	758,775 gallons	Liquid	Difference of 28 gallons
N28	11/2/2016	772,002 gallons	771,975 gallons	Liquid	Difference of 27 gallons
RDO 18 S1/2	11/3/2016	848,866 gallons	848,823 gallons	Liquid	Difference of 43 gallons
RDO 18 N1/2	11/9/2016	1,323,290 gallons	1,323,250 gallons	Liquid	Difference of 40 gallons
RDO 06 W1/2	11/14/2016	1,419,568 gallons	1,419,528 gallons	Liquid	Difference of 40 gallons
RDO 06 E1/2	11/17/2016	1,403,080 gallons	1,403,047 gallons	Liquid	Difference of 33 gallons
RDO 09W1/2	12/1/2016	1,354,129 gallons	1,354,122 gallons	Liquid	Difference of 7 gallons
RDO 03	12/6/2016	2851 ton	2840 ton	Solid	Difference of 11 ton
N08	12/8/2016	1368 ton	1368 ton	Solid	No difference
N09	12/9/2016	1162 ton	1162 ton	Solid	No difference
RDO 01 E1/2	12/15/2016	875 ton	888 ton	Solid	Difference of 13 ton

Field Name	Date of Application	Amount of Manure reported in daily log (tons or gallons)	Amount of Manure Reported in SnapPlus Spreading and Nutrient Management Sorted by Crop Report 3/19/2018	Type of Manure	Concern
N48	12/22/2016	1202 ton	1202 ton	Solid	No difference
RDO 22	1/19/2017	1217 ton	1217 ton	Solid	No difference
N58	1/24/2017	1337 ton	1336 ton	Solid	Difference of 1 ton
N59	1/25/2017	1240 ton	1240 ton	Solid	No difference
N62	1/30/2017	682 ton	682 ton	Solid	No difference
RDO 08	3/21/2017	654,594 gallons	654,570 gallons	Liquid	Difference of 24 gallons
N16	3/24/2017	1,408,320 gallons	1,408,290 gallons	Liquid	Difference of 30 gallons
N17	3/31/2017	1,285,040 gallons	1,305,070 gallons	Liquid	Difference of -19,666 gallons
RDO 04 S1/2	4/5/2017	1,325,809 gallons	1,325,796 gallons	Liquid	Difference of 13 gallons
RDO 04 N1/2	4/6/2017	451,501 gallons	451,440 gallons	Liquid	Difference of 61 gallons
HC1	4/6/2017	514 ton	452 ton	Solid	Difference of 62 ton
N11	4/6/2017	712,467 gallons	712,440 gallons	Liquid	Difference of 27 gallons
N14	4/8/2017	1,111,942 gallons	1,111,890 gallons	Liquid	Difference of 52 gallons

Field Name	Date of Application	Amount of Manure reported in daily log (tons or gallons)	Amount of Manure Reported in SnapPlus Spreading and Nutrient Management Sorted by Crop Report 3/19/2018	Type of Manure	Concern
N13	4/10/2017	1,105,185 gallons	1,105,130 gallons	Liquid	Difference of 55 gallons
N12	4/11/2017	1,269,036 gallons	1,268,995 gallons	Liquid	Difference of 41 gallons
N18	4/12/2017	1,079,073 gallons	1,078,950 gallons	Liquid	Difference of 123 gallons
RDO 11 S1/2	4/14/2017	555,237 gallons	555,229 gallons	Liquid	Difference of 8 gallons
RDO 11 N1/2	4/14/2017	563,369 gallons	563,310 gallons	Liquid	Difference of 59 gallons
N37	4/17/2017	618,934 gallons	618,900 gallons	Liquid	Difference of 34 gallons
N38	4/18/2017	1,185,820 gallons	1,185,750	Liquid	Difference of 70 gallons
N29	4/19/2017	1,213,851 gallons	1,213,800	Liquid	Difference of 51 gallons
PC 01	4/22/2017	561,568 gallons	561,535	Liquid	Difference of 33 gallons
PC 02	4/22/2017	539,396 gallons	539,370	Liquid	Difference of 26 gallons
N42	4/23/2017	1,166,084 gallons	1,088,290	Liquid	Difference of 77,794 gallons

Field Name	Date of Application	Amount of Manure reported in daily log (tons or gallons)	Amount of Manure Reported in SnapPlus Spreading and Nutrient Management Sorted by Crop Report 3/19/2018	Type of Manure	Concern
RDO 15	4/23/2017	1,042,951 gallons	1,042,925	Liquid	Difference of 26 gallons
N40	4/24/2017	604,958 gallons	604,950	Liquid	Difference of 8 gallons
N01	4/26/2017	699 ton	559 ton	Solid	Difference of 140 ton
N02	4/26/2017	440 ton	352 ton	Solid	Difference of 88 ton
N50	4/28/2017	574 ton	600 gallons	Reported solids in Daily 3200-123A	SnapPlus is reported in gallons
N49	4/29/2017	300 ton	300 ton	Solid	No difference
N47	5/2/2017	290 ton	300 gallons	Reported as solids in Daily 3200-123	SnapPlus is reported in gallons
CASINO S	5/4/2017	587 ton	587 ton	Solid	No difference
RDO 17 W1/2	5/4/2017	1,341,371 gallons	1,341,360 gallons	Liquid	Difference of 11 gallons
N61	5/5/2017	252 ton	252 ton	Solid	Difference of 0 ton

Field Name	Date of Application	Amount of Manure reported in daily log (tons or gallons)	Amount of Manure Reported in SnapPlus Spreading and Nutrient Management Sorted by Crop Report 3/19/2018	Type of Manure	Concern
RDO 16	5/6/2017	1,064,707 gallons	1,064,670 gallons	Liquid	Difference of 37 gallons
RDO 13 W1/2	5/8/2017	1,030,929 gallons	1,030,920	Liquid	Difference of 9 gallons
CF02	5/8/2017	577 ton	581 ton	Solid	Difference of -4 ton
CF01	5/9/2017	1047 ton	967 ton	Solid	Difference of 80 ton
RDO 13E1/2	5/9/2017	1,041,489 gallons	1,041,448 gallons	Liquid	Difference of 41 gallons
ELSEN NORTH	5/10/2017	276 ton	276 ton	Solid	No difference
RDO 07 W1/2	5/11/2017	1,087,937 gallons	1,087,879 gallons	Liquid	Difference of 58 gallons
RDO 10	5/13/2017	567,942 gallons	567,936 gallons	Liquid	Difference of 6 gallons
CF01	5/25/2017	2,063,978 gallons	1,908,360 gallons	Liquid	Difference of 155,618 gallons
CF02	5/26/2017	1,098,463 gallons	1,113,688 gallons	Liquid	Difference of -15,225 gallons
RDO 07 E1/2	5/31/2017	572,504 gallons	572,484 gallons	Liquid	Difference of 20 gallons

Field Name	Date of Application	Amount of Manure reported in daily log (tons or gallons)	Amount of Manure Reported in SnapPlus Spreading and Nutrient Management Sorted by Crop Report 3/19/2018	Type of Manure	Concern
N20	6/1/2017	297,168 gallons	301,795 gallons	Liquid	Difference of - 4,627 gallons
N19	6/2/2017	297,168 gallons	297,115 gallons	Liquid	Difference of 53 gallons
N31	6/2/2017	265,930 gallons	306,825 gallons	Liquid	Difference of - 40,894 gallons
N32	6/2/2017	250,811 gallons	289,350 gallons	Liquid	Difference of - 38,539 gallons
ELSEN	6/16/2017	220 ton	220 ton	Solid	No difference
CASINO N	6/19/2017	348 ton	348 ton	Solid	No difference
N05	6/19/2017	585 ton	585 ton	Solid	No difference

Table 2: 2016 Nitrogen Application Rates (2016 Annual Spreading Report)

Field Name	Prior Crop Year 2015	Crop Year 2016	Recommended Rate 2016 of Total Nitrogen (lbs./acre)	Actual Total Rate of Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Exceeds Rate of Total Nitrogen (lbs./acre)
N02	Alfalfa	Potatoes to late harvest, to small grain cover crop	250	293	0	293	43
N11	Alfalfa	Potatoes, late harvest, to small grain cover crop	250	336	85	251	86
N12	Alfalfa (1 st cut) to corn silage	Potatoes, to late harvest, to small grain cover crop	250	334	84	250	84
N13	Snapbeans late plant to small grain cover	Potatoes, late harvest, to small grain cover crop	250	333	84	249	83
N14	Alfalfa (1 st cut) to corn silage	Potatoes, late harvest, to small grain cover crop	250	336	84	252	86
N29	Snapbeans to Snapbeans small grain cover	Potatoes, late harvest, to small grain cover crop	250	356	56	305	106

Field Name	Prior Crop Year 2015	Crop Year 2016	Recommended Rate 2016 of Total Nitrogen (lbs./acre)	Actual Total Rate of Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Exceeds Rate of Total Nitrogen (lbs./acre)
N31	Peas to Snapbeans to small grain cover	Potatoes, late harvest, to small grain cover crop	250	321	56	265	71
N32	Snapbeans, late plant to small grain cover	Potatoes, late harvest, to small grain cover crops	250	340	84	256	90
N33	Corn silage to small grain cover crop	Peas/Snapbeans to small grain cover	100	175	144	31	75
N38	Alfalfa (1 st cut) to corn silage	Potatoes, late harvest, to small grain cover crop.	250	321	56	265	71
N40	Snapbeans to Snapbeans to small grain cover	Potatoes, late harvest, to small grain cover crop	250	325	56	269	75
N41	Alfalfa	Alfalfa	0	103	40	63	103
N42	Snapbeans to Snapbeans to small grain cover	Potatoes, late harvest, to small grain cover crop	250	325	56	279	75

Field Name	Prior Crop Year 2015	Crop Year 2016	Recommended Rate 2016 of Total Nitrogen (lbs./acre)	Actual Total Rate of Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Exceeds Rate of Total Nitrogen (lbs./acre)
N47	Alfalfa (1 st cut) to corn silage	Potatoes, late harvest, to small grain cover crop	250	274	28	246	24
N49	Alfalfa, fall killed	Potatoes, late harvest, to small grain cover crop	250	309	23	286	59
N50	Alfalfa, fall killed	Potatoes, late harvest, to small grain cover crop	250	309	50	286	59
N53	Potatoes, late harvest, to small grain cover crop	Alfalfa established	0	83	41	42	83
N54	Corn silage to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	316	56	250	66
N56	Snapbeans to Snapbeans to small grain cover	Potatoes, late harvest, to small grain cover crop	250	287	56	231	37
N60	Alfalfa	Potatoes, late harvest, to	250	278	38	240	28

Field Name	Prior Crop Year 2015	Crop Year 2016	Recommended Rate 2016 of Total Nitrogen (lbs./acre)	Actual Total Rate of Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Exceeds Rate of Total Nitrogen (lbs./acre)
		small grain cover crop					
N61	Snapbeans to Snapbeans to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	330	26	304	80
RDO 07W	Peas to Snapbeans to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	299	113	186	49
RDO 10	Peas to Snapbeans to small grain cover crop	Potatoes, late harvest, to small grain cover crop.	250	285	60	225	35
RDO 11N	Peas to small grain cover	Potatoes, late harvest, to small cover crop	250	360	84	276	110
RDO 12N	Peas to Snapbeans to small cover grain crop	Potatoes, late harvest, to small cover grain crop	250	293	17	276	43
RDO 13W	Alfalfa (1 st cut) to corn silage	Potatoes, late harvest, to small grain crop	250	352	84	268	102

Field Name	Prior Crop Year 2015	Crop Year 2016	Recommended Rate 2016 of Total Nitrogen (lbs./acre)	Actual Total Rate of Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Exceeds Rate of Total Nitrogen (lbs./acre)
RDO 15	Alfalfa (1 st cut) to corn silage	Potatoes, late harvest, to small grain cover crop	250	309	56	253	59
RDO 16	Peas to Snapbeans to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	326	56	270	76
RDO 17W	Alfalfa (1 st cut) to corn silage	Potatoes, late harvest, to small grain cover crop	250	299	56	243	49
RDO 18 N	Alfalfa	Potatoes, late harvest, to small grain cover crop	250	389	84	305	139
RDO 19S	Potatoes, late harvest, to small grain cover crop	Alfalfa	0	81	0	81	81

Table 3: 2015 Nitrogen Application Rates (2015 Annual Spreading Report)

Field Name	Prior Crop Year 2014	Crop Year 2015	Recommended Rate 2015 Nitrogen (lbs./acre)	Actual Total Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Exceeds Rate of total Nitrogen (lbs./acre)
ELSEN	Sweet corn middle plant (May 20 – June 10) with small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	316	54	262	66
N03	Alfalfa (1 st cut) to Corn Silage	Potatoes, late harvest, to small grain cover crop	250	316	26	290	66
N04	Alfalfa (1 st cut) to Corn Silage	Potatoes, late harvest, to small grain cover crop	250	314	79	235	64
N18	Corn silage to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	307	49	258	57
N19	Snapbeans late plant to small grain cover	Potatoes, late harvest, to small grain cover crop	250	265	0	265	15
N20	Snapbeans late plant to small grain cover	Potatoes, late harvest, to small grain cover crop	250	273	57	216	23

Field Name	Prior Crop Year 2014	Crop Year 2015	Recommended Rate 2015 Nitrogen (lbs./acre)	Actual Total Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Exceeds Rate of total Nitrogen (lbs./acre)
N27	Alfalfa	Potatoes, late harvest, to small grain cover crop	250	322	67	255	72
N30	Peas to Snapbeans to small grain cover	Potatoes, late harvest, to small grain cover crop	250	285	0	285	35
N37	Corn silage to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	317	67	250	67
N39	Corn silage to small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	300	67	233	50
N43	Alfalfa	Potatoes, late harvest, to small grain cover crop	250	309	35	234	59
N51	Peas to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover crop	250	272	0	272	22
N41	Snapbean early plant to small grain cover	Potatoes, late harvest, to	250	283	57	226	33

Field Name	Prior Crop Year 2014	Crop Year 2015	Recommended Rate 2015 Nitrogen (lbs./acre)	Actual Total Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Exceeds Rate of total Nitrogen (lbs./acre)
		small grain cover crop					
N55	Peas to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover crop	250	300	0	300	50
N57	Sweet Corn middle plant (May 20-June 10) with small grain cover crop	Potatoes, late harvest, to small grain cover crop	250	290	36	254	40
N62	Alfalfa (1 st cut) to Corn Silage	Potatoes, late harvest, to small grain cover crop	250	314	38	276	64
PC 01	Peas to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover crop	250	288	0	288	38
PC 02	Peas to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover crop	250	290	0	290	40
RDO 04N	Alfalfa (1 st cut) to Corn Silage	Potatoes, late harvest, to small grain cover crop	250	332	0	332	82

Field Name	Prior Crop Year 2014	Crop Year 2015	Recommended Rate 2015 Nitrogen (lbs./acre)	Actual Total Nitrogen (lbs./acre)	Nitrogen from manure (lbs./acre)	Other sources of Nitrogen (lbs./acre)	Exceeds Rate of total Nitrogen (lbs./acre)
RDO 07E	Snapbean to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover crop	250	297	0	297	47
RDO 08	Snapbean to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover crop	250	297	35	262	47
RDO 11S	Peas to Snapbean to small grain cover	Potatoes, late harvest, to small grain cover crop	250	286	0	286	36
RDO 20	Alfalfa (1 st cut) to corn silage	Potatoes, late harvest, to small grain cover crop	250	294	22	272	44
RDO 21 N	Alfalfa (1 st cut) to corn silage	Potatoes, late harvest, to small grain cover crop	250	278	18	260	28
RDO 21S	Alfalfa (1 st cut) to corn silage		250	310	22	288	60

Table 4.0 2013-2016 Phosphorus Calculations (lbs./acre)

Field ID	4 Years used to calculate uptake rate	Soil Test 2013	Soil Test 2014	Soil Test 2015	Soil Test 2016	4 year total Crop uptake	50% Uptake for average of 4 years	Exceeds 50% Uptake for average of 4 years
N05	2013-2016	175	186	Not provided	Not provided	456.5	343	Yes
N20	2013-2016	203	223	Incorrectly entered into SnapPlus	184	254.5	141	Yes
N21	2013-2016	202	221	Incorrectly entered into SnapPlus	207	254.0	176	Yes
N32	2013-2016	154	191	Incorrectly entered into SnapPlus	176	301.5	158	Yes
N33	2013-2016	158	Not provided	Incorrectly entered into SnapPlus	141	297.1	345	Yes
N53	2013-2016	111	108	Not provided	99.0	379.5	202	Yes
N54	2013-2016	115	124	Not provided	144	244.5	198	Yes
N57	2013-2016	106	125	Not provided	121	269.5	319	Yes
N61	2013-2016	130	147	Not provided	114	233	512	Yes
RDO 06W	2013-2016	Not provided	150	Not provided	104	324.5	177	Yes
RDO 11N	2013-2016	Not provided	169	Not provided	117	338	177	Yes

Table 5: 2017 Insufficient Number of Soil Samples

Field Name	Date of Sampling	Actual Acres	Required Number of samples (1 sample for every 5 acres)	Actual Number of Samples Taken	P-Soil test (ppm)
Basse North	12/13/2016	16.5	3	1	35
CASINO N	12/13/2016	110	22	1	114
CASINO S	12/13/2016	92	18	1	144
CF01	4/20/2016	135	27	1	20
CF02	4/20/2016	73	14	1	50
ELSEN	12/13/2016	45	9	1	95
ELSEN NORTH	12/13/2016	57	11	1	15
HC-1	12/13/2016	50	10	1	50
N01	No samples collected for Crop Year 2017	60			
N02	No samples collected for Crop Years 2017 and 2016	60			
N03	12/13/2016	65	13	1	141
N04	12/13/2016	65	13	1	148
N05	12/13/2016, no samples collected for Crop Years 2016 and 2015	65	13	1	141
N06	12/13/2016	65	13	1	151
N07	12/13/2016	65	13	1	132
N08	12/13/2016	75	15	1	82
N09	12/13/2016	75	15	1	114
N10	12/13/2016, no samples collected for Crop Years 2016 and 2015	85	17	1	162
N11	12/13/2016	45	9	1	165

Table 5: 2017 Insufficient Number of Soil Samples

Field Name	Date of Sampling	Actual Acres	Required Number of samples (1 sample for every 5 acres)	Actual Number of Samples Taken	P-Soil test (ppm)
N12	3/27/2017	65	13	1	151
N13	No samples collected for Crop Year 2017				
N14	12/13/2016	65	13	1	170
N15	12/13/2016,	65	12	1	184
N16	No samples collected for Crop Year 2017				
N17	No samples collected for Crop Year 2017				
N18	12/13/2016	150	30	1	141
N18	10/27/2015	150	30	28	107
N18	10/27/2014	150	30	28	107
N18	9/26/2013	150	30	28	133
N18	11/01/2012	140	30	28	100
N19	No samples collected for Crop Year 2017				
N20	No samples collected for Crop Year 2017				
N21	No samples collected for Crop Year 2017				
N22	No samples collected for Crop Year 2017				
N23	12/13/2016, no samples	60	12	1	151

Table 5: 2017 Insufficient Number of Soil Samples

Field Name	Date of Sampling	Actual Acres	Required Number of samples (1 sample for every 5 acres)	Actual Number of Samples Taken	P-Soil test (ppm)
	collected for Crop Years 2016 and 2015				
N24	12/13/2016, no samples collected for Crop Years 2016 and 2015	60	12	1	165
N25	12/13/2016	60	12	1	162
N26	12/13/2016	60	5	1	198
N27	12/13/2016	75	15	1	178
N28	No samples collected for Crop Year 2017				
N29	12/13/2016	75	15	1	166
N30	12/13/2016	75	15	1	176
N31	No samples collected for Crop Year 2017				
N32	No samples collected for Crop Year 2017				
N33	No samples collected for Crop Year 2017				
N34	No samples collected for Crop Year 2017				
N35	12/13/2016	60	5	1	146
N36	12/13/2016	60	5	1	150
N37	12/13/2016	75	15	1	140

Table 5: 2017 Insufficient Number of Soil Samples

Field Name	Date of Sampling	Actual Acres	Required Number of samples (1 sample for every 5 acres)	Actual Number of Samples Taken	P-Soil test (ppm)
N38	12/13/2016	75	15	1	139
N39	12/13/2016	75	15	1	151
N40	3/27/2017	75	6	1	181
N41	12/13/2016, no samples collected for Crop Years 2016, 2015	70	14	1	156
N42	12/13/2016	70	14	1	99
N43	12/13/2016	75	15	1	151
N44	3/27/2017	75	15	1	189
N45	12/13/2016	65	13	1	117
N46	12/13/2016	65	13	1	124
N47	12/13/2016	75	15	1	131
N48	12/13/2016	75	15	1	97
N49	12/13/2016	60	12	1	112
N50	12/13/2016	60	12	1	120
N51	12/13/2016	75	15	1	200
N52	12/13/2016	75	15	1	150
N53	12/13/2016	75	15	1	132
N54	12/13/2016	75	15	1	170
N55	12/13/2016	65	13	1	183
N56	12/13/2016	65	13	1	163
N57	12/13/2016	75	15	1	132
N58	12/13/2016	75	15	1	133
N59	12/13/2016	75	15	1	110
N60	12/13/2016	75	15	1	93
N61	12/13/2016	100	20	1	149
N62	12/13/2016	75	15	1	113
N63	12/13/2016	75	15	1	96
PC 01	12/13/2016	65	13	1	64
PC 02	12/13/2016	65	13	1	60
RDO 01E	12/13/2016	67	13	1	102
RDO 01W	12/13/2016	66	13	1	98
RDO 02N	12/13/2016	54	11	1	142
RDO 02S	12/13/2016	54	11	1	120

Table 5: 2017 Insufficient Number of Soil Samples

Field Name	Date of Sampling	Actual Acres	Required Number of samples (1 sample for every 5 acres)	Actual Number of Samples Taken	P-Soil test (ppm)
RDO 03	12/13/2016	142	28	1	109
RDO 04N	12/13/2016	66	13	1	146
RDO 04S	12/13/2016	67	13	1	162
RDO 06E	12/13/2016	67	13	1	144
RDO 06W	12/13/2016	66	6	1	162
RDO 07E	12/13/2016	66	13	1	142
RDO 07W	12/13/2016	67	13	1	132
RDO 08	12/13/2016	70	14	1	156
RDO 09E	12/13/2016	66	13	1	153
RDO 09W	12/13/2016	66	13	1	176
RDO 10	No samples collected for Crop Year 2017				
RDO 11N	12/13/2016	66	13	1	195
RDO 11S	12/13/2016	67	13	1	192
RDO 12N	No samples collected for Crop Year 2017				
RDO 13E	No samples collected for Crop Year 2017				
RDO 13W	No samples collected for Crop Year 2017				
RDO 14	12/13/2016	36	4	1	151
RDO 15	12/13/2016	65	6	1	168
RDO 16	12/13/2016	69	6	1	124
RDO 17E	12/13/2016	80	16	1	155
RDO 17W	12/13/2016	80	16	1	175
RDO 18N	12/13/2016	67	13	1	123
RDO 18S	12/13/2016	67	6	1	98
RDO 19E	No samples collected	67			

Table 5: 2017 Insufficient Number of Soil Samples

Field Name	Date of Sampling	Actual Acres	Required Number of samples (1 sample for every 5 acres)	Actual Number of Samples Taken	P-Soil test (ppm)
	for Crop Year 2017				
RDO 19S	12/13/2016	25	5	1	145
RDO 19W	12/13/2016	67	13	1	144
RDO 20	12/13/2016	36	7	1	106
RDO 21N	12/13/2016	67	13	1	140
RDO 21S	12/13/2016	66	13	1	134
RDO 22	12/13/2016	133	27	1	179

ATTACHMENT E

**DOCUMENTS SCANNED,
PHOTOGRAPHED, PROVIDED TO
EPA BY
CENTRAL SANDS DAIRY, LLC,
OR WDNR'S E-PERMITTING
WEBSITE**

TABLE 6: DOCUMENTS SCANNED, PHOTOGRAPHED, PROVIDED TO EPA BY CENTRAL SANDS DAIRY, LLC, OR WDNR's E-PERMITTING WEBSITE

Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
Invoice	(b) (6) Rendering Works, Inc.	June 6, 2017	Invoices	3	JR
MSDS Sheet	MSDS Sheets	2/21/2014	Safety Data Sheets	20	JR
Report	CAFO_3200-123A Daily_Spread_Report_2017.xls	6/21/2017	3200-123A – Daily Report	74	JR
Letter	Approval Letter 1-30-2013.docx	1-30-2013	Frase Crop Consulting, LLC submitting Annual Report	3	JR
Report	Copy of Central Sand Dairy LLC 2012DNRCafoReport3-20-13xlsx	2012	Cover page	1	JR
Calendar	2012CAFOComplianceCalendar January 2012-December2012	2012	Compliance calendar	13	JR
Report	Quarterly Monitoring Report Form	1-26-2012	Monitoring report	8	JR
Report	DNR CAFO Annual Spreading Report	2012	2012 spreading report	23	JR
Report	New2013AnnualReportChecklistNER-revNOV2012.docx	2012	1/30/2013	2	JR
Report	2014AnnualReportChecklist.docx	2014	1/28/2014	3	JR
Letter	ApprovalLetter3-31-2014.docx	3-31-2014	1/29/2014	5	JR
Calendar	2013CAFOCalendarJune2013-December2013	2013	3/27/2013	14	JR
Report	Quarterly Monitoring Report Form	3-27-2013	Jan-March	9	JR
Report	Annual Spreading Report; Monitoring/Inspection; and Compliance Calendars	2014	Received by WDNR October 28, 2014	2	JR
Spreadsheet	Daily Log Spreadsheet	6/03/2014-8/3/2014	Log Not consecutive days	1	JR
Table	Weather Conditions Log	2012	Weather log	1	JR
Table	Daily log	2014	June -August 3, 2014	1	JR
Report	WPDES Annual Report of Central Sands Dairy LLC	1/29/2014	Frase Crop Consulting, LLC WPDESA Annual Report of CSD	1	JR
Snap Plus	DNR CAFO Annual Spreading Reports Crop year 2013	2013	Crop Year 2013	36	JR
Report	FCC Annual Report Template 2014.docx	2014	Permit Year 2013	5	JR
Letter	Approval Letter1-27-2015.docx	1-27-2015	Frase Crop Consulting LLC	1	JR

TABLE 6: DOCUMENTS SCANNED, PHOTOGRAPHED, PROVIDED TO EPA BY CENTRAL SANDS DAIRY, LLC, OR WDNR'S E-PERMITTING WEBSITE

Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
Report	Central Sands Dairy LLC 2014 Manure Trends Report 2014-03-25T0822.pdf	2014	Application summary	5	JR
Report	New 2014 Annual Report Checklist.docx	2014	Jeffrey Frase Crop Consulting, LLC	1	JR
Report	Annual Reports 2015-2016	2015-2016	Annual Report	3	JR
Calendar	Calendar Jan-Dec 2015	2015	CSD Compliance Calendar	12	JR
Report	Quarterly Monitoring Report Form Jan-Mar 2015	1/5/2015	Jan-March	2	JR
Letter- NON	Notice of Noncompliance – Determine CSD to be in noncompliant their current WPDES permit requirements in section 1.5 Nutrient Management	2-24-2015	Applying manure inconsistent with NMP	1	JR
Inspection Report	Wisconsin Department of Natural Resources (WDNR) Inspection Report for a Concentrated Animal Feeding Operation (CAFO) WPDES Permit Complaint Inspection Report	2-10-2015	Inspection Type-Manure Application Complaint Inspection	4	JR
Report	Manure Nutrient Analysis Report	4/6/2015	Date Sampled	2	JR
Report	Quarterly Monitoring Report Form	4/6/2015	April-June	2	JR
WDNR Letter	Enforcement Compliance Summary with Attendees list	5/19/2015	Notes from Meeting	6	JR
Report	Quarterly Monitoring Report Form	7/6/2015	July-Sept	2	JR
WDNR Letter	Notice of Violation/Request for Enforcement Conference	4/6/2015	NOV/Enforcement Conference	6	JR
WDNR Letter	Post-Construction Documentation determine Central Sands Dairy LLC	7/22/2014	WDNR to Anna Wildeman, Michael Best & Friedrich, LLP	2	JR
WDNR Inspection	Wisconsin Department of Natural Resources (WDNR) Inspection for Concentrated Animal Feeding Operation (CAFO) WPDES Complaint Drive-by Inspection	2/26/2015	Drive by Complaint Inspection	7	JR
Michael Best Letter to WDNR	Central Sands Dairy LLC Response to Notice of Violation Casetrack # 2015-WCEE-015: Alleged Manure Stacking Alleged Spreading of Solid Alleged Spreading of Frozen Liquid Manure Post Construction Documentation	5/11/2015	Michael Best's response to the April 6, 2015 alleged violations	5	JR
Report	Quarterly Monitoring Report Form	10/12/2015	Oct-Dec 2015	2	JR
Letter form WDNR	Clarification to April 6, 2015 Notice of Violation	11/2/2015	This letter is to (b)(6) no	1	JR

TABLE 6: DOCUMENTS SCANNED, PHOTOGRAPHED, PROVIDED TO EPA BY CENTRAL SANDS DAIRY, LLC, OR WDNR's E-PERMITTING WEBSITE

Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
			current or pending enforcement issues		
Worksheet	WNDR Animal Calculation Worksheet Form 3400-025A	2015	No date or site name on the work sheet	1	JR
Blue Sheet	Central Sands Dairy Annual Report 2016.pdf	2016	Cover sheet	1	JR
Report	Annual Report Checklist	1/30/2017	CSD Annual Report	1	JR
Calendar	2016 CAFO Compliance Calendar	2016	Jan-Dec 2016	12	JR
Report	Quarterly Inspection Summary Report Form	11/21/2016	Oct-Dec	4	JR
Worksheet	Animal Unit Calculations	June 2017	Current # of AUs on Operation	1	JR
Report	Quarterly Inspection Summary Report Form	6/1/2017	CSD Adam Onan filled it out	1	JR
Document	2017 CAFO Compliance Calendar Jan-June 2017	6/1/2017	Jan-June 2017		JR
Black Binder	NMP: 3/31/2017	3/31/2017	Binder	1	JR
White Tab	NMP 3/31/2017	3/31/2017	Tab sheet	1	JR
White Tab	Section 1 Narrative Checklist	No date	Tab sheet	1	JR
Blue Sheet	1.0 DNR_NMP_Narrative.pdf	No date	Title sheet		JR
Report	NMP Narrative	March 2017	WPDS NMP Central Sands Dairy	11	JR
Report	Groundwater Monitoring Network Documentation (December)	February 13, 2015	RJN Environmental Sciences LLC	7	CV
White sheet	Figures	February 13, 2015	RJN Environmental Sciences LLC	2	CV
White sheet	Attachment 1 Boring logs	February 13, 2015	RJN Environmental Sciences LLC	14	CV
Black Binder	Groundwater Monitoring Records	February 13, 2015	RJN Environmental Sciences LLC	1	CV
White Sheet	Attachment 2 Well Construction Development AND Abandonment Form	February 13, 2015	RJN Environmental Sciences LLC	17	CV

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Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
White Sheet	Attachment 3 Field sampling notes	February 13, 2015	RJN Environmental Sciences LLC	6	CV
White Sheet	Attachment 4 Lab reports	February 13, 2015	RJN Environmental Sciences LLC	2	CV
Report	April 2015 Groundwater Monitoring Network Documentation	May 15 2015	RJN Environmental Sciences LLC	7	CV
Record	Attachment A Field Notes Groundwater Sample Collection Record	April 15 2015	RJN Environmental Sciences LLC	7	CV
Report	Attachment B Laboratory Reports	May 15, 2015	RJN Environmental Sciences LLC	1	CV
Record	WSLH Laboratory Report	April 15, 2015	WSLH	28	CV
Report	Groundwater Monitoring Network Documentation Results of July 2015 Groundwater Sample Analyses	August 10, 2015	RJN Environmental Sciences LLC	7	CV
Attachment	Attachment 1	August 10, 2015	RJN Environmental Sciences LLC	1	CV
Record	Groundwater Sample Collection Record	July 23, 2015	RJN Environmental Sciences LLC	6	CV
Record	Test America Analytical Report	August 7, 2015	Test America	26	CV
Record	WSLH Laboratory Report	July 23, 2015	WSLH	14	CV
Report	Groundwater Monitoring Network Documentation Results of October 2015 Groundwater Sample Analyses	November 18, 2015	RJN Environmental Sciences LLC	3	CV
Table	Tables	November 18, 2015	RJN Environmental Sciences LLC	6	CV

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Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
Maps and graphs	Figures	November 18, 2015	RJN Environmental Sciences LLC	4	CV
Record	Attachment 1 Fields Notes Groundwater Sample Collection Record	November 18, 2015	RJN Environmental Sciences LLC	7	CV
White Sheet	Attachment 2 Lab Reports Test America Analytical Report	November 2, 2015	Test America	26	CV
Record	WSLH Laboratory Report	October 20, 2015	WSLH	14	CV
Report	CSD March 2016 Groundwater Monitoring Network Documentation Results of March 2016 Groundwater Sample Analyses	March 2016	RJN Environmental Sciences LLC	1	CV
Table	Groundwater Elevations	12/14-3/16	RJN Environmental Sciences LLC	7	
Figure	Figures	March 2016	RJN Environmental Sciences LLC	3	CV
Maps and graphs	Maps and graphs	March 8, 2016	RJN Environmental Sciences LLC	2	CV
White Sheet	Attachment A Field Notes	March 2016	RJN Environmental Sciences LLC	1	CV
Record	Groundwater Sample Collection Record	March 2, 2016	RJN Environmental Sciences LLC	6	CV
White Sheet	Attachment B Test America Lab Records	March 2016	RJN Environmental Sciences LLC	1	CV
Report	Test America Analytical Report	March 21, 2016	Test America	22	CV
White Sheet	Attachment C Wisconsin State Laboratory of Hygiene	March 2016	WSLH	1	CV
Record	WSLH Laboratory Report	March 2, 2016	WSLH	14	CV

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Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
White Sheet	White tab CSD July 2016	July 2016	RJN Environmental Sciences LLC	1	CV
Report	Groundwater Monitoring Network Documentation Results of August 2016 Groundwater Sample Analyses	August 16, 2016	RJN Environmental Sciences LLC	2	CV
White Sheet	TABLEs	August 2016	RJN Environmental Sciences LLC	1	CV
Table	Groundwater Elevations	12/14-7/16	RJN Environmental Sciences LLC	1	CV
Table	Groundwater Quality	12/14-7/16	RJN Environmental Sciences LLC	7	CV
White Sheet	Figures	August 2016	RJN Environmental Sciences LLC	1	CV
Map and Graph	Map and Graph	August 2016	RJN Environmental Sciences LLC	2	CV
Report	Laboratory Report	August 2016	RJN Environmental Sciences LLC	1	CV
Report	Test America Analytical Report	August 10, 2016	RJN Environmental Sciences LLC	22	CV
Record	WSLH Laboratory Report	July 26, 2016	WSLH	14	CV
White Sheet	White Tab CSD August 2016	August 2016	RJN Environmental Sciences LLC	1	CV
Report	Groundwater Monitoring Network Documentation Results of September 2016 Groundwater Sample Analyses	September 15, 2016	RJN Environmental Sciences LLC	2	CV
Tables	TABLEs	September 15, 2016	RJN Environmental Sciences LLC	1	CV

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Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
Table	Groundwater Elevations	12/14-09/16	RJN Environmental Sciences LLC	1	CV
Table	Table 2 Groundwater Quality	12/14-09/16	RJN Environmental Sciences LLC	8	CV
Figure	Figures	September 2016	RJN Environmental Sciences LLC	1	CV
Maps	Maps	September 2016	RJN Environmental Sciences LLC	2	CV
Report	Attachment A	September 2016	RJN Environmental Sciences LLC	1	CV
Record	Groundwater Sample Collection Record	September 28, 2016	RJN Environmental Sciences LLC	10	CV
Report	Attachment B	September 2016	Test America	1	CV
Report	Test America Analytical Report	October 12, 2016	Test America	35	CV
Report	Attachment C	September 28, 2016	WSLH	1	CV
Record	WSLH Laboratory Reports	September 28, 2016	WSLH	22	CV
Report	CSD October 2016	October 2016	RJN Environmental Sciences LLC	1	CV
Report	Groundwater Monitoring Network Documentation Results of September 2016 Groundwater Sample Analyses	November 15, 2016	RJN Environmental Sciences LLC	2	CV
Table	TABLES	Dec 14-Nov16	RJN Environmental Sciences LLC	1	CV
Table	Groundwater Elevations	Dec 14-Nov 16	RJN Environmental Sciences LLC	2	CV

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Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
Table	TABLE 2 Groundwater Quality	Dec 14 - Nove16	RJN Environmental Sciences LLC	16	CV
Figure	Figures	Dec 14- Nov 16	RJN Environmental Sciences LLC	1	CV
Maps and Graphs	Maps and Graphs	Dec 14-Nov 16	RJN Environmental Sciences LLC	4	CV
Report	Attachment A Well Construction Documentation	Oct, Nov 16	RJN Environmental Sciences LLC	6	CV
Notes	Attachment B Field Notes	October 2016	RJN Environmental Sciences LLC	1	CV
Record	Groundwater Sample Collection Record	October 25, 2016	RJN Environmental Sciences LLC	11	CV
Report	Attachment C Test America Lab Reports	November 10, 2016	Test America	1	CV
Report	Test America Analytical Report	November 10, 2016	Test America	37	CV
Report	Wisconsin State Laboratory of Hygiene Reports	October 25, 2016	WSLH	26	CV
Report	CSD November 2016	November 2016	RJN Environmental Sciences	1	CV
Report	Groundwater Monitoring Network Documentation Results of October 2016 Groundwater Sample Analyses	December 14, 2016	RJN Environmental Sciences	2	CV
Table	TABLES	Dec 14- Nov 16	RJN Environmental Sciences	1	CV
Table	Groundwater Elevations	Dec 14- Nov 16	RJN Environmental Sciences	2	CV
Table	TABLE 2 Groundwater Quality	Dec 14-Nov 16	RJN Environmental Sciences	13	CV

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Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
Figure	Figures	Dec 14-Nov 16	RJN Environmental Sciences	1	CV
Map and Graph	Map and Graph	Dec 14-Nov 16	RJN Environmental Sciences	3	CV
White Sheet	Attachment A Field Notes	November 29, 2016	RJN Environmental Sciences	1	CV
Record	Groundwater Sampling Collection Record	November 29, 2016	RJN Environmental Sciences	11	CV
Report	Attachment B: Test America Lab Reports	December 7, 2016	Test America	38	CV
Report	Attachment C: Wisconsin State Laboratory of Hygiene	November 29, 2016	WSHL	31	CV
Report	CSD December 2016 Groundwater Monitoring Network Documentation	January 16, 2016	RJN Environmental Services, LLC	3	CV
Tables	TABLES	January 16, 2016	RJN Environmental Services, LLC	16	CV
Figures	Figures	January 16, 2016	RJN Environmental Services, LLC	4	CV
Notes	Attachment A Field Notes	December 28, 2016	RJN Environmental Services	12	CV
Report	Attachment B Test America Lab Reports	January 13, 2016	Test America	39	CV
Report	Attachment C Wisconsin State Laboratory of Hygiene Reports	December 28, 2016	WSLH	27	CV
Report	CSD January 2017 Groundwater Monitoring Network Documentation	February 15, 2017	RJN Environmental Services, LLC	3	CV
Table	Tables	January 2017	RJN Environmental Services, LLC	16	CV

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Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
Figure	Figures	February 13, 2017	RJN Environmental Services, LLC	4	CV
Notes	Attachment A Field Notes	January 27, 2017	RJN Environmental Services, LLC	12	CV
Report	Attachment B Test America Lab Reports	February 8, 2017	Test America	38	CV
Report	Attachment C Wisconsin State Laboratory of Hygiene Reports	January 27, 2017	WSLH	27	CV
Report	CSD March 2017 Groundwater Monitoring Network Documentation	March 15, 2017	RJN Environmental Services, LLC	3	CV
Table	Tables	March 2017	RJN Environmental Services, LLC	21	CV
Figures	Figures	February 23, 2017	RJN Environmental Services, LLC	4	CV
Notes	Attachment A Field Notes	February 22, 2017	RJN Environmental Services	12	CV
Report	Attachment B Test America Lab Reports	March 9, 2017	Test America	39	CV
Report	Attachment C Wisconsin State Laboratory of Hygiene Reports	February 22, 2017	WSLH	27	CV
Report	CSD March 2017 Groundwater Monitoring Network Documentation	March 14, 2017	RJN Environmental Services, LLC	3	CV
Table	TABLES	March 2017	RJN Environmental Services, LLC	21	CV
Figures	Figures	March 23, 2017	RJN Environmental Services	4	CV
Notes	Attachment A Field Notes	March 22, 2017	RJN Environmental Services	12	CV
Report	Attachment B Test America Lab Reports	April 5, 2017	Test America	38	CV

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Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
Report	Attachment C Wisconsin State Laboratory of Hygiene Reports	March 22, 2017	WSLH	27	CV
Report	CSD May 2017 Groundwater Monitoring Network Documentation	May 11, 2017	RJN Environmental Services	3	CV
Table	Tables	May 2017	RJN Environmental Services, LLC	21	CV
Figures	Figures	April 19, 2017	Environmental Services, LLC	4	CV
Notes	Attachment A Field Notes	April 17, 2017	Environmental Services, LLC	12	CV
Report	Attachment B Test America Lab Reports	May 2, 2017	Test America	38	CV
Report	Attachment C Wisconsin State Laboratory of Hygiene Reports	April 17, 2017	WSLH	27	CV
Report	2015 NMP Update	March 31, 2015	Jeff Frase Crop Consulting, LLC	342	AH
NON	Notice of Noncompliance	February 24, 2015	Wisconsin Department of Natural Resources	27	AH
Maintenance Records	(b)(6) Produce Farms, Inc.	June 16, 2017	CSD Equipment	30	AH
Report	2014 SnapPlus and Nutrient Management Sorted by Crop Report	2014	CSD	56	AH
Report	Central Sands Dairy, LLC WPDES Permit WI-0063533-02-0 WPDES Nutrient Management Plan 2012-2016	2012-2016	CSD	750	CB
Permit Renewal	June 2016 NMP Permit Renewal	June 30, 2016	CSD	429	CB
Map	Central Sands Dairy WDNR Approved Fields for Manure Irrigation	June 29, 2015	WDNR	1	CB
Maps	CSD Irrigation Narrative NMP Annual Update 2016.pdf	2015	CSD	501	CB
Chemical Storage area	Chemical Storage Area – CSD would not let EPA access the chemical storage area so CSD took photos	6/22/2017	CSD	3	CB
Maps	Winter Application Maps	2015	CSD	21	CB
Maps	CSD_WinterCF01.pdf	2015	CSD	3	CB
Maps	CSD_WinterCF02.pdf	2015	CSD	2	CB

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Section 3 Reports	Central Sands Dairy 2017.Compliance Check Report 2016-06-24T0311.pdf	6/24/2016	CSD	6	CB
Report	Central Sands Dairy, LLC Fields 590 Report 2016-06-24T0301.pdf	6/24/2016	CSD	14	CB
Report	Central Sands DairyLLC2017.DNRCafo.Report2016-06-27T0312.pdf DNR CAFO Annual Spreading Report Crop Year 2017	6/24/2016	CSD	14	CB
Report	Central Sands Dairy LLC 2018.DNRCafo.Report 2016-06-27T1115.pdf DNR CAFO Annual Spreading Report Crop Year 2018	6/27/2016	CSD	14	CB
Report	CentralSands DairyLLC2019.DNRCafo.Reports2016-0627T1116.pdf DNR Annual Spreading Report Crop Year 2019	6/27/2016	CSD	15	CB
Report	CentralSandsDairyLLC2020.DNRCafo.Reports 2016-06-27T1116.pdfDNR CAFO Annual Spreading Report Crop Year 2020	6/27/2016	CSD	16	CB
Report	CentralSandsDairyLLC2021.DNRCafo.Reports2016-06-27T1117.pdf DNR CAFO Annual Spreading Report Crop Year 2021	6/27/2016	CSD	16	CB
Report	CentralSandsDairy.2017.SpreadPlan.Report2016-06-24T0317.pdf SnapPlus Spreading Plan Report Crop Year 2017	6/24/2016	CSD	24	CB
Report	CentralSandsDairy.2018.SpreadPlan.Report2016-06-27T1117.pdf SnapPlus Spreading Plan Report Crop Year 2018	6/27/2016	CSD	23	CB
Report	CentralSandsDairy.2019.SpreadPlan.Report2016-06-27T1118.pdf SnapPlus Spreading Plan Report Crop Year 2019	6/27/2016	CSD	23	CB
Report	CentralSandsDairy.2020.SpreadPlan.Report2016-06-27T1118.pdf SnapPlus Spreading Plan Report Crop Year 2020	6/27/2016	CSD	23	CB
Report	CentralSandsDairy.2021.SpreadPlan.Report2016-06-27T1119.pdf SnapPlus Spreading Plan Report Crop Year 2021	6/27/2016	CSD	24	CB
Calculations	Days of Storage Calc.pdf	6/23/2016	CSD	6	CB
Animal Calculations	Animal Unit Form 3400025A.pdf	No Date	CSD	3	CB

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Type of Document	Title of Document	Date	Description of the Document	Number of pages	EPA Inspector who scanned or photographed
Report	4.1 SnapPlus Soil Test Report CentralSandsDairyLLC.SoilTests.Report2016-06-24T0315.pdf SnapPlus Soil Test Report Through 2017	6/24/2016	CSD	47	CB
Report	4.2 Manure Samples.pdf	1/23/2014	CSD	28	CB
Report	Deboer2001_MeasurementofDropletSize.pdf	2001	CSD	1	CB
Report	CAFO_3200-123A_Daily_Spead_Report-2015.pdf	2015	CSD	4	CB
Report	CAFO_3200_123A_Daily_Spread_Report.xls	2015	CSD	1	CB
Report	2015 Equip Insp.pdf	2015	CSD	2	CB
Calendar	2016 CAFO Compliance Calendar	2016	CSD	13	CB